



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

June 8, 2006

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Joe K

Pamela Creedon
Executive Officer
Central Valley Regional Water Quality Control Board
11020 SunCenter Dr. Suite 200
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon,

We have reviewed the draft Total Maximum Daily Load (TMDL) to address diazinon and chlorpyrifos impairment for the Delta. Based on our review, we conclude that the TMDL adequately addresses the pollutant of concern, and that the current implementation plans are likely to result in attainment of water quality standards. The TMDL includes allocations, considers seasonal variations and critical conditions, and provides an adequate margin of safety.

We support the diazinon and chlorpyrifos water quality objectives and the science used to develop and support these objectives. These objectives are consistent with the EPA 1985 water quality guidelines. EPA supports the language under the monitoring and reporting program to address pesticide runoff into the Delta. This approach is consistent with the San Joaquin River diazinon and chlorpyrifos TMDL previously adopted by your Board. We also support the use of an additivity formula for considering additive toxicity, especially since diazinon and chlorpyrifos are known to be additive as published in the scientific literature. Your Board has previously adopted this formula into your Basin Plan.

Upon adoption of the Delta diazinon and chlorpyrifos TMDL and the Clear Lake nutrient TMDL, you will have met 100% of your TMDL work plan commitments for this fiscal year. We appreciate your work to date and encourage your Board's timely adoption of this TMDL on June 23. If you have questions, please call me at (916) 930-5646 or Debra Denton at (916) 341-5520.

Sincerely,

Maria Rea
Sr. Policy Advisor
USEPA Region 9
75 Hawthorne St
San Francisco, CA 94105-3901